

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE DYNAGAS LNG PARTNERS LP
SECURITIES LITIGATION

No. 1:19-cv-04512 (AJN)

**PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT, APPROVAL OF FORM OF CLASS NOTICE, AND A HEARING DATE
FOR FINAL APPROVAL OF SETTLEMENT**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Andrew J. Entwistle, dated May 21, 2021, filed herewith (the "Entwistle Declaration"), the exhibits attached thereto, the contemporaneously-filed Plaintiffs' memorandum of law, all prior pleadings and proceedings in the consolidated class actions on behalf of investors in Dynagas LNG Partners LP, Court-appointed Lead Plaintiffs FNY Partners Fund LP, Mario Epelbaum and Scott Dunlop, together with plaintiff Irving Braun, will move this Court, before the Honorable Alison J. Nathan, United States District Judge, in Courtroom 906, Thurgood Marshall United States Courthouse, Foley Square, New York, New York 10007, on a date and at a time designated by the Court, for an Order, substantially in the form of the [Proposed] Order Preliminarily Approving Proposed Settlement and Providing for Notice, attached hereto as Exhibit A (the "Proposed Order"), or any other form as the Court deems appropriate: (i) granting preliminary approval of the proposed settlement (the "Settlement") as memorialized in the Stipulation and Agreement of Settlement (ECF No. 135); (ii) conditionally certifying a class for purposes of the Settlement only as defined in the Proposed Order (the "Settlement Class"); (iii) preliminarily appointing Lead Counsel Entwistle & Cappucci LLP as class counsel for purpose of the Settlement; (iv) approving the parties' proposed forms and method of giving notice of the pendency of this Action and the Settlement to the Settlement Class;

(v) directing that notice be given to the Settlement Class Members; and (vi) scheduling, for such time as the Court deems appropriate, a hearing at which the Court will consider (a) the Parties' request for final approval of the Settlement Class, the Settlement, and the Plan of Allocation, (b) entry of the [Proposed] Final Approval Judgment and Order of Dismissal, and (c) Lead Counsel's application for an award of attorneys' fees and reimbursement of litigation expenses; and (vii) granting such other and further relief as the Court deems just and proper.

The Proposed Order would set the following schedule for settlement-approval-related events, which is tethered to the date the Court enters the Proposed Order and the date for which the Court sets a hearing on final approval of the Settlement:

Event	Proposed Timing
Deadline for mailing the Notice and Claim Form to Settlement Class Members (the " Notice Date ")	Twenty-eight days after entry of the Court's Order. Proposed Order ¶ 8(b).
Deadline for publishing the Summary Notice	Within seven days after the Notice Date. <i>Id.</i> ¶ 8(d)
Deadline for motions in support of final approval of the Settlement, Plan of Allocation, and application for attorneys' fees and expenses	Thirty-five days prior to the Settlement Hearing. <i>Id.</i> ¶ 28.
Deadline for receipt of requests for exclusion or objections	Twenty-one days prior to the Settlement Hearing. <i>Id.</i> ¶¶ 14, 17
Deadline for filing reply papers, responses to objections and proof of mailing Notice	Seven days prior to the Settlement Hearing. <i>Id.</i> ¶ 28.
Deadline for submitting Claim Forms	120 days after the Notice Date. <i>Id.</i> ¶ 11
Final Approval Hearing	At the Court's earliest convenience following notice to the Settlement Class. <i>Id.</i> ¶ 5.

DATED: May 21, 2021

Respectfully Submitted,

/s/ Andrew J. Entwistle

Andrew J. Entwistle

ENTWISTLE & CAPPUCCI LLP

Frost Bank Tower

401 Congress Avenue, Suite 1170

Austin, Texas 78701

Telephone: (512) 710-5960

Facsimile: (212) 894-7272

aentwistle@entwistle-law.com

-and-

Robert N. Cappucci

Brendan J. Brodeur

230 Park Avenue, 3rd Floor

New York, NY 10169

Telephone: (212) 894-7200

Facsimile: (212) 894-7272

rcappucci@entwistle-law.com

bbrodeur@entwistle-law.com

*Counsel for Plaintiffs FNY Partners Fund
LP, Mario Epelbaum, Scott Dunlop and
Irving Braun and Lead Counsel for the
Class*

Curtis V. Trinko

LAW OFFICES OF CURTIS V. TRINKO

39 Sintsink Drive West

First Floor

Port Washington, New York 11050

Telephone: (212) 490-9550

Facsimile: (212) 986-0158

ctrinko@trinko.com

*Additional Counsel for Plaintiff Irving
Braun*